

No. 02-18-00138-CR

**IN THE COURT OF APPEALS
FOR THE SECOND DISTRICT OF TEXAS
AT FORT WORTH**

FILED IN
2nd COURT OF APPEALS
FORT WORTH, TEXAS
6/28/2019 3:44:42 PM
DEBRA SPISAK
Clerk

CRYSTAL MASON,
Appellant,
v.
STATE OF TEXAS,
Appellee.

**MOTION FOR ADMISSION *PRO HAC VICE*
FOR SOPHIA LIN LAKIN**

TO THE HONORABLE COURT OF APPEALS OF TEXAS FOR THE SECOND
CIRCUIT AT FORT WORTH, TEXAS:

Sophia Lin Lakin (“Applicant”) respectfully files her Motion for Admission
Pro Hac Vice to appear on behalf of Crystal Mason pursuant to Texas Government
Code Section 82.001, *et seq.* and Rule XIX of the Rules Governing Admission to
the Bar of Texas.

1. Applicant's contact information is: American Civil Liberties Union Foundation, Inc., 125 Broad Street, 18th Floor, New York, New York 10004; Phone: (212) 519-7836; Fax: (212) 549-2654; email: slakin@aclu.org.

2. Applicant will be associated in this proceed with Thomas Buser-Clancy. Thomas Buser-Clancy is an attorney licensed in Texas and will remain associated in these proceedings. Mr. Buser-Clancy's contact information is: American Civil Liberties Union Foundation of Texas, P.O. Box 8306, Houston, Texas 77288; Telephone: (713) 325-7011; Fax: (713) 942-8966; email: tbuser-clancy@aclutx.org; Texas State Bar No. 24078344.

3. Applicant has appeared *pro hac vice* in the Western District of Texas, San Antonio Division, *Texas LULAC, et al v. Whitley, et al*, Civil Action No. 19-cv-00074. The case was jointly dismissed on April 29, 2019.

4. Applicant is an active member in good standing in each of the following courts and jurisdictions:

Court:	Admission Date:
State of New York	November 18, 2013
Eastern District of Wisconsin	May 11, 2015
Fourth Circuit Court of Appeals	April 28, 2016
Tenth Circuit Court of Appeals	May 4, 2016
Sixth Circuit Court of Appeals	April 6, 2017
Eighth Circuit Court of Appeals	November 4, 2016

Fifth Circuit Court of Appeals	May 22, 2017
Eleventh Circuit Court of Appeals	May 17, 2017
Supreme Court of the United States	June 12, 2017
Seventh Circuit Court of Appeals	July 24, 2018

5. Applicant has not been the subject of any disciplinary action by any of the above-listed courts, or any state or federal courts in any jurisdiction of the United States.

6. Applicant has not been denied admission to any state or federal courts in the United States during the preceding five (5) years.

7. Applicant is familiar with the Texas State Bar Act, the Texas State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing the conduct of members of the State Bar of Texas, and will at all times abide by and comply with same so long as this matter is pending and she has not withdrawn as counsel herein.

8. Pursuant to Rule XIX(b) of the Rules Governing Admission to the Bar of Texas, Applicant submits Mr. Buser-Clancy's motion which contains a statement that he finds Attorney Lakin to be a reputable attorney and recommending that Attorney Lakin be granted permission to participate in this matter before the Court. *See Exhibit A, T. Buser-Clancy's Rule XIX(b) Motion.*

9. Pursuant to Rule XIX(c) of the Rules Governing Admission to the Bar of Texas, Applicant submits the Non-Resident Acknowledgment Letter from the Texas State Board of Law Examiners. *See* Exhibit B, Acknowledgment Letter.

WHEREFORE, Applicant respectfully requests that this Motion and enter an order allowing her to participate as one of the attorneys for Crystal Mason, in the above captioned and numbered cause of action.

Respectfully submitted,

/s/ Sophia Lin Lakin

Sophia Lin Lakin
New York Bar No. 5182076
American Civil Liberties Union Foundation, Inc.,
125 Broad Street, 18th Floor,
New York, New York 10004;
Phone: (212) 519-7836;
Fax: (212) 549-2654
slakin@aclu.org

/s/ Thomas Buser-Clancy

Thomas Buser-Clancy
Texas Bar No. 24078344
ACLU Foundation of Texas
P.O. Box 8306
Houston, TX 77288
Telephone: (713) 325-7011
Fax: (713) 942-8966
Tbuser-clancy@aclutx.org

CERTIFICATE OF CONFERENCE

I certify that I have conferred with the office of the Assistant District Attorney via email on or before the date of the filemark appended hereto. On June 28, 2019, Cynthia Burgess, legal assistant to Assistant District Attorney Helena Faulkner, confirmed via email that she had spoken with Ms. Faulkner and the State has no objection to this motion.

/s/ Thomas Buser-Clancy
Thomas Buser-Clancy

CERTIFICATE OF SERVICE

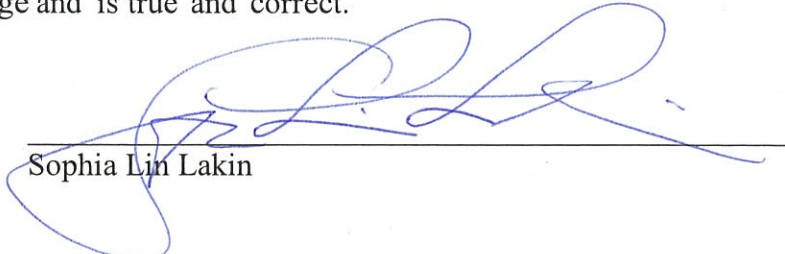
I hereby certify that on this 28th day of June, 2019, a true and correct copy of the foregoing was properly served on all counsel of record in this above-captioned case in accordance with the Texas Rules of Appellate Procedure through this Court's electronic filing system.

/s/ Thomas Buser-Clancy
Thomas Buser-Clancy

VERIFICATION

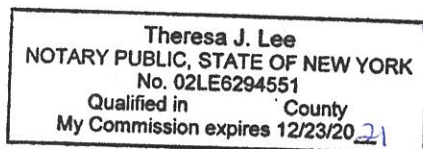
STATE OF NEW YORK §
COUNTY OF NEW YORK §

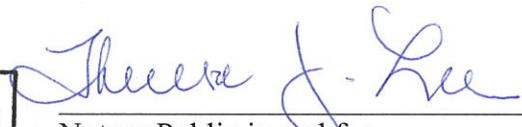
Before me, the undersigned Notary Public, on this day personally appeared Sophia Lin Lakin, a person whose identity is known to me. After being duly sworn she stated under oath that she is the applicant in this matter; that she did read the Motion for Admission *Pro Hac Vice* for Sophia Lin Lakin, and that every statement contained therein is within her personal knowledge and is true and correct.



Sophia Lin Lakin

Sworn to and subscribed before me by Sophia Lin Lakin on June 24, 2019.





Notary Public in and for
The State of New York

My commission expires: 12/23/21

EXHIBIT A

No. 02-18-00138-CR

**IN THE COURT OF APPEALS
FOR THE SECOND DISTRICT OF TEXAS
AT FORT WORTH**

CRYSTAL MASON,
Appellant,
v.
STATE OF TEXAS,
Appellee.

**MOTION PURSUANT TO RULE XIX(B) OF THE RULES GOVERNING
ADMISSION TO THE BAR OF TEXAS**

TO THE HONORABLE COURT OF APPEALS OF TEXAS FOR THE SECOND
CIRCUIT AT FORT WORTH, TEXAS:

I, Thomas Buser-Clancy, respectfully file this motion pursuant to Rule XIX(b) of the Rules Governing Admission to the Bar of Texas in Support of Applicant Sophia Lin Lakin's Motion for Admission *Pro Hac Vice*. The undersigned counsel hereby finds that Attorney Lakin is a reputable attorney and moves that Attorney Lakin be granted permission to participate in this matter before this Court.

WHEREFORE, I, Thomas Buser-Clancy, hereby respectfully request that
this Motion be granted.

Respectfully submitted,

/s/ Thomas Buser-Clancy

Thomas Buser-Clancy

Texas Bar No. 24078344

ACLU Foundation of Texas

P.O. Box 8306

Houston, TX 77288

Telephone: (713) 325-7011

Fax: (713) 942-8966

Tbuser-clancy@aclutx.org

Attorney for Appellant Crystal Mason

CERTIFICATE OF CONFERENCE

I certify that I have conferred with the office of the Assistant District Attorney via email on or before the date of the filemark appended hereto. On June 28, 2019, Cynthia Burgess, legal assistant to Assistant District Attorney Helena Faulkner, confirmed via email that she had spoken with Ms. Faulkner and the State has no objection to this motion.

/s/ Thomas Buser-Clancy
Thomas Buser-Clancy

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2019, a true and correct copy of the foregoing was properly served on all counsel of record in this above-captioned case in accordance with the Texas Rules of Appellate Procedure through this Court's electronic filing system.

/s/ Thomas Buser-Clancy
Thomas Buser-Clancy

EXHIBIT B

Board of Law Examiners
Appointed by the Supreme Court of Texas

May 10, 2019

Sophia Lin Lakin
Via: E-Mail

Acknowledgment Letter
Non-Resident Attorney Fee

According to Texas Government Code §82.0361, "a nonresident attorney requesting permission to participate in proceedings in a court in this state shall pay a fee of \$250 for each case in which the attorney is requesting to participate."

This Acknowledgement Letter serves as proof that the Board of Law Examiners has received \$250 in connection with the following matter:

Non-resident attorney: Sophia Lin Lakin

Case: 02-18-00138-CR

Texas court or body: Court of Appeals for the Second District of Texas

After satisfying the fee requirement, a non-resident attorney shall file a motion in the Texas court or body in which the non-resident attorney is requesting permission to appear. The motion shall contain the information and statements required by Rule 19(a) of the Rules Governing Admission to the Bar of Texas. The motion must be accompanied by this Acknowledgment Letter and by a motion from a resident practicing Texas attorney that contains the statements required by Rule 19(b).

The decision to grant or deny a non-resident attorney's motion for permission to participate in the proceedings in a particular cause is made by the Texas court or body in which it is filed.

For more information, please see Rule 19 of the Rules Governing Admission to the Bar of Texas and §82.0361, of the Texas Government Code, which can be found on the Board's website.

Signed,



Susan Henricks
Executive Director

MAILING ADDRESS
Post Office Box 13486
Austin, Texas 78711-3486

TELEPHONE: 512- 463-1621 - FACSIMILE: 512- 463-5300
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